

# **Exhibit 4**

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

THE MIDDLE EAST FORUM, : CIVIL ACTION NO.  
2:19-cv-05697-JS

Plaintiff, :

vs.

2

LISA REYNOLDS-BARBOUNIS,

2

Defendant.

— — —

## Videotaped deposition of

DANIEL PIPES, taken via Zoom Conference on Thursday,

September 2, 2021, commencing at approximately 12:08

p.m., before Kori Skinner, Professional Court Reporter -

Notary Public, there being present:

\*\*CONFIDENTIAL - ATTORNEY'S EYES ONLY\*\*

12 Q Okay. So is that the only way that you can think  
13 of that -- that the Middle East Forum was affected  
14 because you hired a lawyer to find out if you were  
15 affected?

16 A No. We hired experts to look at the economic  
17 damage that your client caused us. I'm not in a  
18 position to explain that to you. She stole our  
19 information, I know that. The impact of the stealing of  
20 that information I cannot tell you.

21 Q Okay. You said the impact. You don't know what  
22 the impact was, is that what you just said?

23 A I told you that that is not my domain.

24 Q Okay.

1 A We have an expert who is investigating this for us.

2 Q Who's the expert that you're talking about?

3 A You'll have to ask Mr. Roman.

4 Q Do you know who it is?

5 A I have seen the name, I can't tell you the name.

6 Q Well, what kind of expert are they?

7 A Now that I think about it, her name is Stout.

8 She's an expert on economic damages in cases like this,

9 and she's reviewing the materials.

10 Q An expert on economic damages?

11 A I believe so.

12 Q What's her name?

13 A Stout.

14 Q Stout?

15 A S-T-O-U-T.

16 Q Is that Ms. Stout or Mr. Stout?

17 A Ms., I believe.

18 Q When was she retained?

19 A Some weeks ago.

20 Q Sorry?

21 A Some weeks ago.

22 Q Okay. So you retained her in -- sometime around

23 August of 2021?

24 A I believe so.

1 CERTIFICATION  
2  
34 I hereby certify that the proceedings and  
5 evidence are contained fully and accurately in the  
6 stenographic notes taken by me upon the foregoing matter  
7 and that this is a correct transcript of the same.  
8  
910 *Kori Skinner*  
11

12 Kori Skinner

13 Court Reporter-Notary Public